Norkin v. DLA Piper Rudnick Gray Cary L.L.P. Doc. 24

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DAVID NORKIN

Plaintiff,

-against-

DLA PIPER RUDNICK GRAY CARY LLP,

Defendant.

Civil Action No. 05 Civ. 9137(DC)

DECLARATION OF JEAN LEWIS IN SUPPORT OF DEFENDANT'S MOTION TO TRANSFER TO CONNECTICUT

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JEAN LEWIS, under the penalties of perjury, declares:

1. I am an attorney at Kramon & Graham, P.A., One South Street, Suite 2600, Baltimore, Maryland 21202. I have been authorized by the Court to appear pro hac vice on behalf of defendant DLA Piper Rudnick Gray Cary LLP ("Piper") in this matter. I make this declaration in support of Defendant's Motion to Transfer to Connecticut.

2. Attached as Exhibit 1 is a true and accurate copy of the docket report from In re Norkin, Petition No. 97-50043, in the Bankruptcy Court for the District of Connecticut, as of January 19, 2006.

Dockets.Justia.com

3. Attached as Exhibit 2 is a true and accurate copy of the docket report from In re Britestarr Homes, Inc., Petition No. 02-50811, in the Bankruptcy Court for the District of Connecticut, as of January 19, 2006.

4. Attached as Exhibit 3 is a true and accurate copy of the docket report from the case of Britestarr Homes, Inc. v. Piper Rudnick LLP, Case No. 03-05072, in the Bankruptcy Court for the District of Connecticut, as of January 19, 2006.

5. Attached as Exhibit 4 is a true and accurate copy of a document dated June 18, 2002, styled "Unanimous Consent of Shareholders of Britestarr Homes, Inc.," and executed by Ronald Chorches, Chapter 7 Trustee for the Estate of David Norkin, and Friema Norkin.

6. Attached as Exhibit 5 is a true and accurate copy of a document dated June 18, 2002, styled "Resolution of Sole Director of Britestarr Homes, Inc.," and executed by Steven Smith, sole director of Britestarr as of June 18, 2002.

7. Attached as Exhibit 6 is a true and accurate copy of the complaint filed by Britestarr Homes, Inc., against Piper Rudnick LLP, one of Piper's predecessor firms, on or about July 31, 2003, in the Bankruptcy Court for the District of Connecticut.

8. Attached as Exhibit 7 is a true and accurate copy of a "joint prosecution agreement," dated October 26, 2004, among David Norkin; Norkin's personal bankruptcy counsel as of October 26, 2004, The Law Offices of Mark M. Kratter; and the law firm of Caddell & Chapman, which represents Britestarr in litigation against Piper in the District of Connecticut.

I declare under the penalty of perjury, that the foregoing is true and correct.

Executed: January 19, 2006

JEAN LEWIS